

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Adrian Nichole Jackson, Debtor

**Case No. 23-01433-JAW
CHAPTER 13**

MOTION TO INCUR NEW DEBT

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 06/22/2023.
2. Debtor is paying approximately 0% to General Unsecured Debts through the plan.
3. Debtor is currently without a vehicle.
4. Debtor wishes to borrow up to \$30,000.00 to purchase a vehicle with a monthly payment not to exceed \$550.00. Debtor will pay this debt to the lender direct pursuant to the terms of the agreement with the lender.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Bankruptcy Court for the SOUTHERN DISTRICT OF MISSISSIPPI by using the CM/ECF system. I certify that the U.S. Trustee and Trustee appointed to this case are registered CM/ECF users and that service to these individuals will be accomplished by the CM/ECF system.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.